

Exhibit 20

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Brent Caslin (Cal. Bar. No. 198682)
JENNER & BLOCK LLP
633 West Fifth Street
Suite 3600
Los Angeles, California 90071
Telephone: 213 239-5100
Facsimile: 213 239-5199
bcaslin@jenner.com

Terrence J. Truax (*pro hac vice*)
Michael T. Brody (*pro hac vice*)
Charles B. Sklarsky (*pro hac vice*)
Gabriel A. Fuentes (*pro hac vice*)
Jenner & Block LLP
353 N. Clark Street
Chicago, Illinois 60654-3456
Telephone: 312 222-9350
Facsimile: 312 527-0484
ttruax@jenner.com
mbrody@jenner.com
csklarsky@jenner.com
gfuentes@jenner.com

Harold A. Barza (Cal. Bar. No. 80888)
Kevin Y. Teruya (Cal. Bar. No. 235916)
halbarza@quinnemanuel.com
kevinteruya@quinnemanuel.com
865 South Figueroa Street, 10th Floor
Los Angeles, California 90017-2543
Telephone: (213) 443-3000
Facsimile: (213) 443-3100

Ryan S. Goldstein (Cal. Bar No. 208444)
ryangoldstein@quinnemanuel.com
NBF Hibiya Building, 25F
1-1-7, Uchisaiwai-cho, Chiyoda-ku
Tokyo 100-0011, Japan
Telephone: +81 3 5510 1711
Facsimile: +81 3 5510 1712

*Attorneys for Defendants Mitsubishi Electric
Corporation, Mitsubishi Electric US, Inc., and
Mitsubishi Electric Visual Solutions America, Inc.*

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In Re: Cathode Ray Tube (CRT) Antitrust
Litigation

This Document Relates To:

*Crago, d/b/a Dash Computers, Inc. et al. v.
Mitsubishi Electric Corporation, et al.*, Case
No. 14-cv-2058-JST

Master File No. 07-5944-JST

Case No. 14-cv-2058-JST

MDL No. 1917

**mitsubishi electric visual
solutions america, inc.'s third
supplemental response to direct
purchaser plaintiff crago, d/b/a
dash computers, inc.'s first set of
interrogatories to defendants
mitsubishi, thomson and tda**

Judge: Hon. Jon S. Tigar

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Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Mitsubishi Electric Visual Solutions America, Inc. (“MEVSA”) hereby supplements its response to Direct Purchaser Plaintiff Crago, d/b/a Dash Computers, Inc.’s First Set of Interrogatories to Defendants Mitsubishi, Thomson, and TDA, served upon MEVSA by the Direct Purchaser Plaintiffs (“DPPs”) on September 4, 2014. This supplemental response incorporates MEVSA’s prior responses from October 6, 2014, May 26, 2015, and July 28, 2015.

GENERAL OBJECTIONS APPLICABLE TO ALL INTERROGATORIES

1. MEVSA objects to the definitions and instructions contained within the interrogatories to the extent they purport to impose requirements beyond or inconsistent with the requirements of the Federal Rules of Civil Procedure, the Court’s Local Rules, or any other applicable rule or Court order.

2. MEVSA objects to the interrogatories as overbroad, unduly burdensome, and oppressive due to the significant burden and expense of responding to the interrogatories and because the interrogatories seek information that is not within MEVSA’s possession, custody or control.

3. MEVSA objects to the interrogatories to the extent that they seek documents and information that would disclose MEVSA’s or a third party’s trade secrets or other confidential, proprietary, and/or highly-sensitive information.

4. MEVSA objects to the interrogatories to the extent that they seek disclosure of privileged information, including information protected by the attorney-client privilege, work-product doctrine, the joint defense privilege, or any other applicable privilege or immunity. Any inadvertent disclosure of privileged or protected documents, materials, or information shall not be construed as a waiver of any applicable privileges or protections.

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5. MEVSA objects to the interrogatories to the extent that they seek the discovery of information regarding the sale of CRTs or finished products containing CRTs outside of the United States and unrelated to United States commerce, on the grounds that they are overbroad, unduly burdensome, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence.

6. In making these responses, MEVSA does not concede the relevancy or materiality of any of the DPPs' interrogatories.

7. A response by MEVSA that it will produce information responsive to a particular interrogatory, subject to any applicable objections, is not a representation that such information exists.

8. MEVSA's responses and objections herein do not in any way constitute an adoption of the DPPs' purported definitions of words or phrases contained in the interrogatories. MEVSA objects to the definitions to the extent that they: (i) are vague, ambiguous, confusing, and/or overly broad; (ii) are inconsistent with the ordinary and customary meaning of the words or phrases they purport to define; and/or (iii) incorporate other purported definitions that suffer from such defects. Without limiting the breadth and general application of these objections, MEVSA further objects to the definition of "Documents" to the extent it purports to include documents that are not reasonably accessible to MEVSA or are beyond the scope of any applicable e-discovery obligations.

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12. Provide Your sales of CRT and/or CRT Products to the United States and globally for each month from January 1, 1991 to the present. For each month during this period, state the volume of sales, the U.S. dollar value of sales, the unit sale price, the per unit cost to produce CRT and/or CRT Products, the per unit cost to distribute CRT and/or CRT Products (including overseas freight, tariff, customs, duties, inland freight, storage, insurance, dealer commissions), and the per unit profit earned.

THIRD SUPPLEMENTAL RESPONSE: MEVSA hereby incorporates by reference its previous objections to this Interrogatory as if set forth fully herein. Subject to and without waiving the foregoing and general objections, MEVSA further supplements its prior responses as follows. MEVSA notes that for a portion of the period referenced in the Interrogatory, Mitsubishi Consumer Electronics America, Inc., known as "MCEA," sold CRT televisions in the United States. MCEA no longer exists, as Mitsubishi Electric Corporation and its subsidiaries (MEVSA and Mitsubishi Electric US, Inc.) have not participated in the CRT business for many years. MEVSA is a successor to MCEA. MEVSA responds that documents from MEVSA's document production contain the following monthly sales figures for CRT televisions sold by MCEA from January 1995 to December 1998:

Monthly CRT Television Sales			
Year	Month	\$	Source
1995			
	January	\$31,851,068.00	ME 00191298
	February	\$28,221,576.00	ME 00192961
	March	\$27,681,100.00	ME 00189254
	April	\$21,465,322.00	ME 00192632
	May	\$24,362,563.00	ME 00189253
	June	\$28,965,220.00	ME 00151341
	July	\$28,437,075.00	ME 00190899
	August	\$38,043,536.00	ME 00151282
	September	\$53,865,943.00	ME 00192960
	October	\$50,494,152.00	ME 00190208
	November	\$50,209,795.00	ME 00192081
	December	\$49,233,149.00	ME 00191075

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	Total	\$432,830,499.00	
1996			
	January	\$26,805,696.00	ME 00150949
	February	\$27,805,173.00	ME 00150465
	March	\$22,703,441.00	ME 00191784
	April	\$23,146,534.00	ME 00191450
	May	\$24,233,863.00	ME 00190207
	June	\$27,001,989.00	ME 00192959
	July	\$28,962,072.00	ME 00243442
	August	\$39,314,423.00	ME 00150918
	September	\$46,396,946.00	ME 00150840
	October	\$44,362,544.00	ME 00150421
	November	\$32,345,190.00	ME 00150440
	December	\$34,955,306.00	ME 00189387
	Total	\$378,033,177.00	
1997			
	January	\$26,942,747.00	ME 00192074
	February	\$24,622,370.00	ME 00191182
	March	\$15,445,829.00	ME 00150864
	April	\$12,263,302.00	ME 00152581
	May	\$13,797,997.00	ME 00153422
	June	\$19,247,003.00	ME 00153074
	July	\$28,962,072.00	ME 00150944
	August	\$18,401,486.00	ME 00190615
	September	\$21,990,948.00	ME 00153040
	October	\$28,866,544.00	ME 00191292
	November	\$31,106,371.00	ME 00191776
	December	\$41,604,204.00	ME 00191466
	Total	\$283,250,873.00	
1998			
	January	\$14,088,000.00	ME 00190200
	February	\$16,581,000.00	ME 00189893
	March	\$17,094,000.00	ME 00191291
	April	\$9,616,121.00	ME 00191777
	May	\$13,770,999.00	ME 00191442
	June	\$12,368,599.00	ME 00192433
	July	-\$3,265,567.00	ME 00153656
	August	\$866,677.00	ME 00191905
	September	\$388,790.00	ME 00192432
	October	\$504,358.00	ME 00190613
	November	\$130,736.00	ME 00189894
	December	-\$76,507.00	ME 00190060

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	Total	\$82,067,206.00	
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MEVSA further states that it has been unable to verify the accuracy of these CRT television sales figures, as the business has long been closed.

Dated: February 18th, 2016

By: /s/ Michael T. Brody

Terrence J. Truax
Charles B. Sklarsky
Michael T. Brody
Gabriel A. Fuentes
Jenner & Block LLP
353 North Clark St., Chicago, IL 60654
Tel: 312-222-9350
Fax: 312-527-0484

Harold A. Barza
Kevin Y. Teruya
Ryan S. Goldstein
Quinn Emanuel Urquhart & Sullivan LLP
865 S. Figueroa St.
Los Angeles, CA 90017
Tel: 213-443-3000
Fax: 213-443-3100

*Attorneys for Defendants Mitsubishi
Electric Corporation, Mitsubishi Electric
US, Inc., and Mitsubishi Electric Visual
Solutions America, Inc.*

VERIFICATION FOR MEVSA

I, Yasuhiro Baba, declare and state:

I have read Mitsubishi Electric Visual Solutions America, Inc.'s ("MEVSA") foregoing Third Supplemental Response to Direct Purchaser Plaintiff Crago, d/b/a Dash Computers, Inc.'s First Set of Interrogatories to Defendants Mitsubishi, Thomson, and TDA ("Third Supplemental Response") and know its contents. The Third Supplemental Response is limited by the records and information in existence, presently recollected, and thus far discovered in the course of preparation of this Third Supplemental Response. Based thereon, I am informed and believe that the matters stated in this Third Supplemental Response are true and on that ground certify or declare under penalty of perjury under the laws of the United States of America that the same are true and correct.

Executed this 18th day of February, 2016 at Chicago, Illinois.


Yasuhiro Baba